Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Marker Ball Replacements - Phase 6

PP&A No.: 6587

Project Manager: Jodie Anderson - TEPL-TPP-1

Location: Western Oregon and Washington

<u>Categorical Exclusion Applied (10 C.F.R. Part 1021):</u> B1.3 Routine Maintenance; B1.9 Airway Safety Markings and Painting; B3.2 Aviation Activities.

<u>Description of the Proposed Action:</u> Bonneville Power Administration (BPA) proposes to remove, replace, or retire approximately 329 marker balls on several transmission lines in Clackamas, Clatsop, Columbia, Curry, Lane, Lincoln, Linn, Marion, and Washington counties, Oregon; and Cowlitz, Jefferson, King, Kitsap, Mason, Pierce, Skagit, Snohomish, Thurston, and Wahkiakum counties, Washington (Attachment 1). As part of BPA's wildfire mitigation effort, BPA discovered that plastic and fiberglass marker balls can fail at their attachment point on conductor or ground wire, potentially igniting and falling to the ground to start wildfires. Existing marker balls are yellow, orange, or white in color, and are 24 to 36 inches in diameter. New marker balls would be the same colors, but are all would be 36 inches in diameter, constructed of metal, and have an improved clamping system to better secure them to transmission lines. Construction is proposed for Fall 2025.

All marker ball activities would utilize Human External Cargo (HEC) - a two-person crew suspended from a helicopter. Up to 45 helicopter landing zones are necessary for helicopters to land and take off, refuel, and stage crew and equipment. Flatbed trucks, trailers, or similar vehicles would be used to haul materials and equipment. Grading, vegetation removal, or other potentially ground-disturbing work would not be performed at helicopter landing zones or associated access roads.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

Findings: In accordance with Section 1021.102 of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, Jul. 9, 1996; 61 FR 64608, Dec. 6, 1996; 76 FR 63764, Nov. 14, 2011; 89 FR 34074, April 30, 2024; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National*

Environmental Policy Act (NEPA), Implementing Procedures (dated June 30, 2025), BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review. ¹

/s/ <u>Oden Jahn</u> Oden W. Jahn Physical Scientist (Environmental)

Concur:

/s/ <u>Katey Grange</u> Katey C. Grange

NEPA Compliance Officer Date: <u>July 23, 2025</u>

Attachment(s): Environmental Checklist

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¹BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

Attachment 1- Marker Ball Spans

Operating Name	Span	Span Length (ft)	Helicopter LZ	County	State	MB Qty (span)	Comments
Albany-Eugene No.1 Eugene-Alderwood No.1	36/1-35/7 5/10-6/1	532	AEEALZ1 / AEEALZ1 ALT	Lane	OR	4	Replace MBs
Albany-Eugene No.1 Eugene-Alderwood No.1	36/2-36/1 5/9-5/10	391	AEEALZ1 / AEEALZ1 ALT	Lane	OR	3	Replace MBs
Albany-Eugene No.1 Eugene-Alderwood No.1	36/3-36/2 5/8-5/9	400	AEEALZ1 / AEEALZ1 ALT	Lane	OR	1	Replace MBs
Albany-Eugene No.1 Eugene-Alderwood No.1	36/4-36/3 5/7-5/8	460	AEEALZ1 / AEEALZ1 ALT	Lane	OR	1	Replace MBs
Albany-Eugene No.1 Eugene-Alderwood No.1	36/5-36/4 5/6-5/7	265	AEEALZ1 / AEEALZ1 ALT	Lane	OR	2	Replace MBs
Albany-Eugene No.1 Eugene-Alderwood No.1	36/6-36/5 5/5-5/6	620	AEEALZ1 / AEEALZ1 ALT	Lane	OR	1	Replace MBs
Albany-Eugene No.1 Eugene-Alderwood No.1	36/7-36/6 5/4-5/5	675	AEEALZ1 / AEEALZ1 ALT	Lane	OR	4	Replace MBs
Ashe-Marion No.2 Buckley-Marion No.1	205/2-206/1 79/2-80/1	3190	AMBMLZ1 / AMBMLZ1 ALT	Clackamas	OR	5	Replace MBs
Ashe-Marion No.2 Buckley-Marion No.1	223/5-224/1 97/5-98/1	1129	AMBMLZ2	Marion	OR	4	Replace MBs
Driscoll-Naselle No.1	28/1-28/2	2950	DNLZ1 / DNLZ1 ALT	Wahkiakum	WA	4	Replace MBs
Driscoll-Naselle No.1	5/1-5/2	2613	DNLZ2 ALT	Clatsop Wahkiakum	OR/WA	9	Replace MBs
Echo Lake-Maple Valley No.1&2	8/6-9/1	2450	ELMVLZ1	King	WA	16	Replace MBs
Elbe tap to Alder- LaGrande No.1&2	1/2-1/3	1315	EALLZ1 / EALLZ1 ALT	Thurston	WA	6	Replace MBs
John Day-Marion No.1	106/3-107/1	3153	AMBMLZ1 / AMBMLZ1 ALT	Clackamas	OR	5	Replace MBs
Keeler-Allston No.1	1/8-2/1	530	KALZ1	Washington	WA	6	New MBs Only
Longview-Allston No.3 Longview-Allston No.4	2/3-2/4 2/2-2/3	3540	NALZ1 / NALZ2	Columbia	OR	2	Remove MBs Only
Longview-Allston No.3 Longview-Allston No.4	2/4-3/1 2/3-3/1	2860	NALZ1 / NALZ2	Columbia	OR	4	Remove MBs Only

Operating Name	Span	Span Length (ft)	Helicopter LZ	County	State	MB Qty (span)	Comments
Longview-Allston No.3 Longview-Allston No.4	3/1-3/2	2585	NALZ1 / NALZ2	Columbia	OR	2	Remove MBs Only
Marion-Alvey No.1	60/4-61/1	2350	MALZ1 ALT	Lane	OR	3	Remove MBs Only
Monroe-Custer No.1	29/2-29/3	1211	MCLZ1	Snohomish	WA	7	Remove MBs Only
Monroe-Custer No.1	48/4-48/5	1777	MCLZ2	Skagit	WA	2	Replace MBs
Murray-Custer No.1	3/10-4/1	1620	MURCLZ1	Snohomish	WA	4	Replace MBs
Napavine-Allston No.1	35/5-36/1	3610	NALZ1 / NALZ2	Cowlitz	WA	1	Remove MBs Only
Napavine-Allston No.1	36/1-37/1	3018	NALZ1 / NALZ2	Cowlitz Columbia	WA/OR	4	Remove MBs Only
Napavine-Allston No.1	37/1-37/2	2427	NALZ1 / NALZ2	Columbia	OR	1	Remove MBs Only
Paul-Allston No.2	46/1-46/2	3618	NALZ1 / NALZ2	Cowlitz	WA	4	Remove MBs Only
Paul-Allston No.2	46/2-47/1	3018	NALZ1 / NALZ2	Cowlitz Columbia	WA/OR	20	Remove MBs Only
Paul-Allston No.2	47/1-47/2	2350	NALZ1 / NALZ2	Columbia	OR	4	Remove MBs Only
Paul-Allston No.2	48/1-48/2	2467	NALZ1 / NALZ2	Columbia	OR	4	Remove MBs Only
Rogue-Gold Beach No.1	5/2-5/3	2735	RGBLZ1 / RGBLZ1 ALT	Curry	OR	12	Replace MBs
Santiam-Bethel No.1	1/2-1/3	1501	SBLZ1 / SBLZ1 ALT	Linn	OR	6	Replace MBs
Schultz-Raver No.1	75/5-75/6	634	SRLZ3	King	WA	8	Replace MBs
Schultz-Raver No.1 Schultz-Echo Lake No.1	61/2-61/3	500	SRLZ2	King	WA	7	Replace MBs
Shelton-Fairmount No.3&4	20/2-20/3	2006	SFLZ2 ALT	Mason	WA	9	New MBs Only
Shelton-Fairmount No.3&4	21/1-21/2	1250	SFLZ2 ALT	Mason	WA	6	New MBs Only

Operating Name	Span	Span Length (ft)	Helicopter LZ	County	State	MB Qty (span)	Comments
Shelton-Fairmount No.3&4	27/1-27/2	1545	SFLZ3/SFLZ3 ALT	Mason	WA	4	New MBs Only
Shelton-Fairmount No.3&4	28/1-28/2	1645	SFLZ3/SFLZ3 ALT	Mason	WA	4	New MBs Only
Shelton-Fairmount No.3&4	29/1-29/2	1580	SFLZ3/SFLZ3 ALT	Mason	WA	5	New MBs Only
Shelton-Fairmount No.3&4	33/3-33/4	1494	SFLZ4	Jefferson	WA	6	New MBs Only
Shelton-Fairmount No.3&4	34/2-34/3	2124	SFLZ4	Jefferson	WA	10	New MBs Only
Shelton-Fairmount No.3&4	34/5-35/1	1644	SFLZ4	Jefferson	WA	5	New MBs Only
Shelton-Fairmount No.3&4	36/5-37/1	1981	SFLZ5	Jefferson	WA	9	New MBs Only
Shelton-Fairmount No.3&4	40/2-40/3	2099	SFLZ6	Jefferson	WA	9	New MBs Only
Shelton-Fairmount No.3&4	44/2-44/3	1006	SFLZ7 / SFLZ7 ALT	Jefferson	WA	4	New MBs Only
Shelton-Fairmount No.3&4	46/5-46/6	912	SFLZ8/SFLZ9	Jefferson	WA	3	New MBs Only
Shelton-Fairmount No.3&4	47/5-48/1	1364	SFLZ8/SFLZ9	Jefferson	WA	4	New MBs Only
Shelton-Fairmount No.3&4	48/3-48/4	963	SFLZ8/SFLZ9	Jefferson	WA	4	New MBs Only
Shelton-Fairmount No.3&4	8/5-8/6	1549	SFLZ1	Mason	WA	6	New MBs Only
Shelton-Kitsap No.4	1/1-1/2	723	SKLZ1 / SKLZ1 ALT	Mason	WA	4	Replace MBs
Shelton-Kitsap No.4	2/3-2/4	1125	SKLZ2	Mason	WA	4	Replace MBs
Shelton-Kitsap No.4	32/2-32/3	331	SKLZ3	Kitsap	WA	4	Replace MBs
Tacoma-Covington No.2 Tacoma-Raver No.1	10/4-10/5	1050	TCLZ1	King	WA	5	Remove MBs Only
Tacoma-Covington No.2 Tacoma-Raver No.1	10/5-11/1	1000	TCLZ1	King	WA	5	Remove MBs Only

Operating Name	Span	Span Length (ft)	Helicopter LZ	County	State	MB Qty (span)	Comments
Tacoma-Covington No.2 Tacoma-Raver No.1	11/1-11/2	375	TCLZ1	King	WA	1	Remove MBs Only
Tacoma-Covington No.2 Tacoma-Raver No.1	11/2-11/3	710	TCLZ1	King	WA	3	Remove MBs Only
Tacoma-Covington No.3&4	10/4-10/5	500	TCLZ1	King	WA	2	Replace MBs
Tacoma-Covington No.3&4	10/5-10/6	550	TCLZ1	King	WA	2	Replace MBs
Tacoma-Covington No.3&4	10/6-11/1	1000	TCLZ1	King	WA	2	Replace MBs
Tacoma-Covington No.3&4	11/1-11/2	420	TCLZ1	King	WA	5	Replace MBs
Tacoma-Covington No.3&4	11/2-11/3	665	TCLZ1	King	WA	3	Replace MBs
Toledo-Wendson No.1	2/3-2/4	2281	TWLZ1 / TWLZ1 ALT	Lincoln	OR	11	Replace MBs
Trojan-Allston No.1&2	2/4-3/1	1150	TALZ1	Columbia	OR	4	Replace MBs
Wendson-Tahkenitch No.1 Wendson-Tahkenitch No.2	1/4-2/1 1/2-2/1	4127	WTLZ1 / WTLZ1 ALT	Lane	OR	20	Replace MBs

Marker balls associated with Schultz-Raver No.1/Schultz-Echo Lake No.1 42/3-42/4 and John Day-Marion No.1 83/4-84/1 were not analyzed as part of this Categorical Exclusion.

Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

Proposed Action: Marker Ball Replacements - Phase 6

Project Site Description

The proposed action is located in Clackamas, Clatsop, Columbia, Curry, Lane, Lincoln, Linn, Marion, and Washington counties, Oregon; and Cowlitz, Jefferson, King, Kitsap, Mason, Pierce, Skagit, Snohomish, Thurston, and Wahkiakum counties Washington. The proposed action would occur within, and adjacent to, BPA's right-of-way (ROW) and access roads of select spans of several high voltage transmission lines listed in Table 1, below. The marker ball span associated with Schultz-Raver 61/2-61/3 occurs on lands managed by the United States Forest Service Mt. Baker-Snoqualmie National Forest. The remainder occurs on other non-federal public and private lands.

The marker ball spans range between 265 feet to 4,127 feet in length (Table 1). Vegetation in the ROW is managed to prevent tall-growing vegetation from encroaching in the energized zone which can cause transmission line outages or fires. In many parts of the action area, the vegetation regime resembles an early seral state; however, in deep canyons, the maximum height of mature vegetation, such as conifers, will not interfere with the operation of the transmission line. In these areas, vegetation is not managed, or only the tallest vegetation is managed. Elevations of the structures in the action area range from seven feet to 3,180 feet above sea level.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No

Explanation: Oregon Sites:

On December 23rd, 2024 BPA initiated Section 106 consultation for the Area of Potential Effect (APE) with the Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians; the Confederated Tribes of Siletz Indians; the Confederated Tribes of Grand Ronde; the Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO); the Coquille Indian Tribe; the Cowlitz Indian Tribe; and the Oregon State Historic Preservation Office (SHPO). BPA's contractor completed a cultural resources survey of the proposed helicopter landing zones. No archaeological resources were identified. Eleven eligible transmission lines and six not eligible transmission lines were identified within the APE, none would be impacted. BPA sent copies of survey reports and BPA's determination of No Adverse Effect to Historic Properties to the consulting parties on May 21st, 2025. Concurrence was received from SHPO on June 6th, 2025, and the CTWSRO on June 19th, 2025. No other responses were received within 30 days.

Washington Sites:

On December 23rd, 2024 BPA initiated Section 106 consultation for the APE with the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Chehalis Reservation, the Confederated Tribes of Siletz Indians, the Confederated Tribes of Grand Ronde, the Cowlitz Indian

Tribe, the Jamestown S'Klallam Tribe, the Muckleshoot Indian Tribe, the Nisqually Indian Tribe, the Port Gamble S'Klallam Tribe, the Puyallup Tribe of Indians, the Skokomish Indian Tribe, the Snoqualmie Indian Tribe, the Squaxin Island Tribe, the Stillaguamish Tribe of Indians, the Suquamish Tribe, the Tulalip Tribes, King County Preservation Program, the Washington Department of Natural Resources, and the Washington Department of Archaeology and Historic Preservation (DAHP). BPA's contractor completed a cultural resources survey of the proposed helicopter landing zones. No archaeological resources were identified. Five eligible transmission lines and 11 not eligible transmission lines were identified within the APE, none would be impacted. BPA sent copies of survey reports and BPA's determination of No Adverse Effect to Historic Properties to the consulting parties on May 21st, 2025. Concurrence was received from DAHP on May 21st, 2025, and the Suquamish Tribe on May 27th, 2025. No other responses were received within 30 days.

2. Geology and Soils

Potential for Significance: No

Explanation: Project activities are not expected to result in soil disturbances.

3. Plants (including Federal/state special-status species and habitats)

Potential for Significance: No

Explanation: There are no Federal/state special-status plant species or habitats known to occur in the project area. Vegetation may be crushed in landing zones or where equipment would be staged for marker ball replacements, but this would be a temporary impact. There would be no effect to ESA-listed plant species, and no impacts to state or other sensitive plant species are anticipated.

4. Wildlife (including Federal/state special-status species and habitats)

Potential for Significance: No with Conditions

Explanation: Columbian white-tailed deer (CWTD), gray wolf, North American wolverine, Pacific marten, marbled murrelet, northern spotted owl (NSO), streaked horned lark, yellow-billed cuckoo, northwestern pond turtle, and monarch butterfly are potentially present in the project area. Project activities may temporarily disturb individual Columbian white-tailed deer, gray wolf, North American wolverine, Pacific marten, marbled murrelet, northern spotted owl, or streaked horned lark if present in the project area at the time of these activities. Yellow-billed cuckoo, and monarch butterfly are not expected to be in the project area at the time of project activities and northwestern pond turtle is expected to be in its inactive period at the time of project activities. Therefore, BPA determined that the proposed project may affect but is not likely to adversely affect Columbian white-tailed deer, gray wolf, North American wolverine, Pacific marten, marbled murrelet, northern spotted owl, streaked horned lark, yellow-billed cuckoo, northwestern pond turtle, and monarch butterfly. The US Fish and Wildlife Service concurred with these determinations in a letter dated June 16, 2025. Additionally, non-sensitive bird species may utilize the trees adjacent to the ROW corridor for nesting and rearing, however, the project would occur after the general breeding season for birds.

Notes: The following conservation measures would be implemented during this project:

- Helicopters would transit from the municipal airport to the work area at an elevation greater than 500 meters (1640 feet) Above Ground Level (AGL).
- Columbian White-tailed Deer:
 - BPA personnel and contractors would be instructed to not approach Columbian white-tailed adults or fawns at any time.

- To avoid and minimize impacts to CWTD during the fawning period, project activities would not occur from June 1 to July 15 in the range of CWTD.
- Northern Spotted Owl: Except where noted in the species discussion below, hoovering helicopter work within 50 yards from modeled suitable NSO habitat would take place outside of the breeding season (March 1 to September 30), and work areas between 50 and 110 yards from suitable habitat would take place outside of the critical breeding season (March 1 to July 15).
- Marbled Murrelet: Helicopter activities within the disruption distance from assumedoccupied suitable habitat, would take place outside of the breeding season from April 1 to September 15 (OR)/September 23 (WA), or within the breeding season with daily dawn/dusk timing restrictions (start work at least two hours after sunrise and end work at least two hours before sunset. Sunrise/sunset times are to be based on U.S. Naval Observatory data).
- Streaked Horned Lark: No project activities would take place during the breeding season, from April 1 through August 31.
- Northwestern Pond Turtle: No project activities would take place during the active season, from April 16 through September 30 in occupied hydrologic units.
- Overnight camping would not take place during project activities.
- Work hours would be during daylight hours, approximately between 9am and 5pm.
- To minimize the risk of attracting predators to activity areas, all garbage (especially food products) must be contained or removed daily from the vicinity of any activity that occurs within the action area.

5. Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)

Potential for Significance: No with Conditions

Explanation: The project area spans several canyons containing significant waterbodies, such as the Columbia River, Siuslaw River, South Fork Stillaguamish River, North Fork Stilliguamish River, Skagit River, Dosewallips River, Duckabush River, Middle Fork Willamette River, North Santiam River, Mollala River, Rogue River, Yaquina River, and Spencer Creek, and several smaller creeks. Some of the waterbodies are habitat for ESA-listed anadromous fish. Project activities are not expected to impair the physical or biological functions of fish-bearing or non-fish-bearing water bodies or floodplains in the project area.

Notes: The following conservation measures would be implemented during this project:

- Helicopter landing zones would be the only areas where fueling would occur in the project area. Standard BMPs would be implemented during fueling operations and include:
 - Fueling would not occur within 150 feet of a water resource or conveyance (e.g., a lake, pond, river, stream, wetland, canal, ditch, etc.).
 - o When possible, fueling would occur on a flat and impermeable surface.
 - Spill management and fire suppression equipment would be immediately available.
 - Fueling would only be conducted by trained and qualified personnel in accordance with governing laws, regulations, policies, and procedures.
 - Workers performing fueling would receive training in proper fueling operations and spill response.
 - Fueling equipment would have a kill switch that can immediately stop the fueling operation.
 - The flow rate of fueling equipment would not exceed 10 gallons per minute.
 - While fueling, the operator would cup an absorbent pad under the nozzle and wait 30 seconds after fueling has stopped to allow all fuel to leave the nozzle. When returning from the helicopter to the fueling truck, the operator would hold the cupped nozzle upwards.

 Should any fuel be spilled, the soil would be excavated and placed in a plastic bag or container for proper handling and disposal.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: No wetlands have been identified in the project area; however, wetlands may be found adjacent to the waterbodies listed above. Project activities would not result in soil disturbances within wetlands; however, refueling activities have the potential to contaminate wetlands that may be adjacent to landing zones, though that risk would be minimized through the implementation of BMPs.

Notes: The helicopter fueling BMPs described above would minimize the potential for the proposed project to impact wetlands.

7. Groundwater and Aquifers

Potential for Significance: No with Conditions

<u>Explanation</u>: Refueling activities have the potential to impact groundwater or aquifers via spill contamination. BMPs identified are expected to reduce the risk of potential groundwater contamination.

Notes: The helicopter fueling BMPs described above would minimize the potential for the proposed project to impact groundwater or aquifers.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

<u>Explanation</u>: No change in land use would occur and project activities would not impact existing land uses; however, there may be temporary disruptions to recreational users where project activities would take place on public lands. This disturbance would be expected to be short term, typically lasting less than one day per span.

9. Visual Quality

Potential for Significance: No

Explanation: The project would have a minimal impact to visual quality. Replacement marker balls would be similar to the existing marker balls and consistent with other marker balls along the transmission line. The addition of maker balls where none existed may make the transmission lines more visible to the public; however, the intent of the marker balls is to make the transmission lines more visible to aircraft.

10. Air Quality

Potential for Significance: No

Explanation: The proposed project would utilize conventional equipment and helicopters powered by petroleum fuels. Exhaust would temporarily impact air quality in the immediate vicinity while the equipment is in operation. Additionally, dust may be created by helicopter operations. Dust creation would be isolated to small areas and in short duration. Water would be used for dust suppression when needed. Baseline air quality conditions are expected to return shortly after project activities cease.

11. Noise

Potential for Significance: No

Explanation: Project would produce noise associated with the use of a small helicopter. During project activities, work would take place during daylight hours, for approximately eight hours per day. The project would be relatively short in duration – no more than two days at a single transmission line span. The baseline operational noise of the transmission line would not change.

12. Human Health and Safety

Potential for Significance: No

<u>Explanation</u>: BPA's contractor would develop a site-specific health and safety plan to address any hazards that may be encountered during the proposed work, including potential exposure to dust and the use of human external cargo.

Evaluation of Other Integral Elements

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.

Explanation: N/A

Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation: N/A

Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.

Explanation: N/A

Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation: N/A

Landowner Notification, Involvement, or Coordination

<u>Description</u>: BPA coordinated with the USFS Mt. Baker-Snoqualmie National Forest and received the appropriate authorizations on March 31, 2025. Non-Federal landowners were notified of the project on October 15, 2024.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Oden Jahn Date: July 23, 2025

Oden W. Jahn

Physical Scientist (Environmental)